

Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- a. Cluster GS-1 to GS-10 (PWD) Answer Yes
- b. Cluster GS-11 to SES (PWD) Answer Yes

In FY 2019, the Bureau's percentage of PWD employed in the GS-01 to GS-10 (including WS-01 to WS-07) cluster was 4.94% and GS-11 to SES (including WS-08 to WS-15) cluster was 2.55%. Both cluster groups fell below the benchmark of 12%.

*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- a. Cluster GS-1 to GS-10 (PWTD) Answer Yes
- b. Cluster GS-11 to SES (PWTD) Answer Yes

In FY 2019, the Bureau's percentage of PWTD employed in the GS-01 to GS-10 (including WS-01 to WS-07) cluster was 1.14% and GS-11 to SES (including WS-08 to WS-15) cluster was .54%. Both cluster groups fell below the benchmark of 2%.

Grade Level Cluster(GS or Alternate Pay Plan)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--		12%		2%
Grades GS-1 to GS-10					
Grades GS-11 to SES					

3. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.

The Bureau communicated the PWD and PWTD goals throughout the Agency via Performance Work Plans, quarterly Diversity Council Meetings, Recruitment Sub-committee meetings, Regional Affirmative Employment Program Administrators retreat and teleconferences and Executive Staff training.

Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

Answer Yes

The Conflict Resolution, Equal Employment, and Diversity (CREED) Office is evaluating hiring a Disability Employment Program Manager. Additionally, the Human Resource Management Division (HRMD) is in the process of hiring an additional staff member to assist with processing requests for reasonable accommodation.

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Architectural Barriers Act Compliance	1	0	0	Kurt Nance National Reasonable Accommodation Coordinator knance@bop.gov
Section 508 Compliance	1	0	0	Steven (Scott) Jenkins Chief sjenkins@bop.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Kurt Nance National Reasonable Accommodation Coordinator knance@bop.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Georgette Brown, Ph.D., LCSW Affirmative Employment Programs Officer/ Selective Placement Program Coordinator gbrown@bop.gov
Special Emphasis Program for PWD and PWTD	0	0	128	AEP Committees maintain a Disability Employment Special Emphasis Program Manager
Processing applications from PWD and PWTD	1	0	0	Matthew (Matt) Mangold Chief mmangold@bop.gov

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Answer Yes

All managers and supervisors complete mandatory training requirements including Schedule A: Roadmap to Success within 60 days of entry to position; Uniformed Services Employment and Reemployment Act (USERRA) and Veteran Employment for Hiring

Managers within 60 days of entry to position and annually thereafter. Principles of Leadership training also incorporates Reasonable Accommodation Training.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer Yes

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.		
Objective	Evaluate an increase in designated officials for processing Reasonable Accommodations.		
Target Date	Dec 31, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019		An additional Reasonable Accommodation Specialist position was classified and announced. The hiring certificates have been received and interviews are in the process of being scheduled.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	An additional Reasonable Accommodation Specialist position was classified.	
Objective	Finalize updates to the Bureau's Reasonable Accommodation procedures, following publication of DOJ's Reasonable Accommodation procedures to include the 30 business day processing time.		
Target Date	Aug 19, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Aug 19, 2019		Recommended changes to the Agency's processing time frames to ensure alignment with DOJ policy were submitted to the Human Resources Management Directorate for review. It is noted that this review may require the input of the Union and this review may take additional time.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	Recommended changes to the Agency's processing time frames to ensure alignment with DOJ policy were submitted to the Human Resources Management Directorate for review.	

Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD.

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with

targeted disabilities.

In accordance with policy, each Affirmative Employment Programs (AEP) Committee must submit a Disabled Veterans Affirmative Action Program (DVAAP) Accomplishment Report annually. The DVAAP focuses on the reporting of methods used to recruit and employ disabled veterans, especially those who are 30 percent or more disabled, as well as improvement of internal advancement opportunities for disabled veterans. Each AEP Committee must submit an annual Federal Equal Opportunity Recruitment Program (FEORP) Plan. The FEORP establishes targeted recruitment efforts to reach underrepresented groups including PWD and PWTD. The Bureau's public website and vacancy announcements on the USAJOBS website provide information on Reasonable Accommodation and Personal Assistance Services.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce

The Bureau uses all available and appropriate hiring authorities to recruit and hire PWD and PWTD: Schedule A, Veterans Recruitment Appointment (VRA), 30% or More Disabled Veteran, Veterans Employment Opportunities Act of 1998 (VEOA), as amended, and Pathways Programs.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

For Schedule A, the Bureau's Selective Placement Program Coordinator reviews the applicant's disability medical documentation. Upon verifying the applicant is a person with an intellectual disability, severe physical disability or a psychiatric disability, documentation of eligibility for employment under Schedule A is then forwarded to the appropriate Institution Human Resource Office and Human Resource Services Center, Consolidated Staffing Unit, for adjudication of position qualifications.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer Yes

Managers and supervisors complete mandatory training requirements including Schedule A: Roadmap to Success within 60 days of entry to position; Uniformed Services Employment and Reemployment Act (USERRA) and Veteran Employment for Hiring Managers within 60 days of entry to position and annually thereafter. Principles of Leadership Training also incorporates Reasonable Accommodation Training.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

Each Affirmative Employment Programs Committee maintains a Disability Employment Special Emphasis Program Manager who is responsible for engaging in community outreach efforts, such as developing working relationships with representatives of the Department of Veterans Affairs (VA) Vet Centers, Veterans Career Centers and military installations. In addition, annually, each Bureau facility prepares a FEORP Plan to recruit and build a more inclusive workplace for under-represented groups including PWD and PWTD.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.

- a. New Hires for Permanent Workforce (PWD) Answer Yes
- b. New Hires for Permanent Workforce (PWTD) Answer Yes

The Bureau is committed to meeting established goals set forth under Section 501 for employment of PWD and PWTD. To this end, in reviewing Table B1: Total Workforce Table, PWD represent 7.49% and PWTD represent 1.69% of the Bureau's total permanent workforce. From FY 2018 to FY 2019, the Bureau's employment of PWD and PWTD increased. Of the 2,913 permanent new hires in FY 2019, 8.03% of new hires identified as PWD and 1.51% identified as PWTD. Another 141 employees were hired with a disability that was Not Identified, increasing the total percentage of PWD hired to 12.87%.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for MCO (PWD) Answer No
- b. New Hires for MCO (PWTD) Answer No

In reviewing Table B7: Applicants and Hires for Major Occupations, PWD and PWTD qualified and were selected as new hires for MCOs within the series of 0006, 0007 and 0101.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Qualified Applicants for MCO (PWD) Answer No
- b. Qualified Applicants for MCO (PWTD) Answer No

According to Table B9: Selections for Internal Competitive Promotions for Major Occupations, data indicated PWD and PWTD applied and were qualified for internal selections for MCOs within the series of 0006, 0007 and 0101.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Promotions for MCO (PWD) Answer No

b. Promotions for MCO (PWTD)

Answer No

According to Table B9: Selections for Internal Competitive Promotions for Major Occupations, data indicated PWD and PWTD applied and were selected for internal selections for MCOs within the series of 0006, 0007 and 0101. Among the respective qualified applicant pools, PWTD were selected at a higher percentage rate within the 0101 series.

Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

Describe the agency’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

Annually, Bureau employees are provided with the opportunity to complete an Individual Training Needs Assessment in which strategic planning initiatives, implementation of new technology, mission changes, mandatory training standards, audits/reviews, performance improvements identified during the performance appraisal process may be included for incorporation in the Annual Training Plan and completion during the FY. Employees may also apply to Training Opportunity Announcements for specialty programs provided throughout the year. In addition, there are a myriad number of professional development initiatives available via self-studies, computer-based training modules and distance learning courses (Cross Development Courses, Graduate School, OPM, ACA self-study courses, FEMA, NIC, BLU web-based courses).

B. CAREER DEVELOPMENT OPPORTUNITES

1. Please describe the career development opportunities that the agency provides to its employees.

The Bureau offers mandatory training which is positional in nature. Mentoring Training is offered at Bureau facilities. Many locations provide leadership development via various forums. Annually, Bureau employees are provided with the opportunity to complete an Individual Training Needs Assessment in which strategic planning initiatives, implementation of new technology, mission changes, mandatory training standards, audits/reviews, performance improvements identified during the performance appraisal process may be included for incorporation in the Annual Training Plan and completion during the FY. Employees may also apply to Training Opportunity Announcements for select programs provided throughout the year. In addition, there are a myriad number of self-studies, computer-based training modules and distance learning courses (Cross Development Courses, Graduate School, OPM, ACA self-study courses, FEMA, NIC, BLU web-based courses), available to employees.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	1,344	41	3.94%	0%	2.08%	0%

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Mentoring Programs	2,743	2,743	6.20%	6.20%	1.39%	1.39%

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWD) Answer N/A
- b. Selections (PWD) Answer N/A

The Bureau's technological systems currently allow for extraction of completion data for professional development programs. However, because of compartmentalization of specialty training provided on an ongoing basis at field locations, applicant flow data is not available.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTD) Answer N/A
- b. Selections (PWTD) Answer N/A

The Bureau's technological systems currently allow for extraction of completion data for professional development programs. However, because of compartmentalization of specialty training provided on an ongoing basis at field locations, applicant flow data is not available.

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- a. Awards, Bonuses, & Incentives (PWD) Answer Yes
- b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

In reviewing Workforce Table B13: Employee Recognition and Awards, triggers existed as follows: Time Off Awards (1-9 hrs) - 2.26% less for PWTD; Time Off-Awards (9+ hrs) - 6.21% less for PWD; Cash Awards (\$100-\$500) - 2.99% less for PWD; and Cash Awards (\$500+) - 20.61% less for PWD and 24.41% less for PWTD, than the total awards.

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- a. Pay Increases (PWD) Answer Yes
- b. Pay Increases (PWTD) Answer Yes

Workforce Table B13: Employee Recognition and Awards revealed Quality Step Increases (QSI) were 3.31% less for PWD and 21.55% less for PWTD than the total awards.

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

- a. Other Types of Recognition (PWD) Answer N/A
- b. Other Types of Recognition (PWTD) Answer N/A

The Bureau does not have any other types of employee recognition programs.

D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. SES
 - i. Qualified Internal Applicants (PWD) Answer Yes
 - ii. Internal Selections (PWD) Answer Yes
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer Yes
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Answer Yes
 - ii. Internal Selections (PWD) Answer Yes

According to Table B11: Internal Selections for Senior Level Positions, data indicated the following were below the percentage of the relevant applicant pools by one or more percent: PWD qualified and selected for Grades GS-13 and SES, and PWD selected for Grade GS-15.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and

describe your plan to provide the data in the text box.

- | | |
|---|------------|
| a. SES | |
| i. Qualified Internal Applicants (PWTD) | Answer No |
| ii. Internal Selections (PWTD) | Answer Yes |
| b. Grade GS-15 | |
| i. Qualified Internal Applicants (PWTD) | Answer No |
| ii. Internal Selections (PWTD) | Answer No |
| c. Grade GS-14 | |
| i. Qualified Internal Applicants (PWTD) | Answer No |
| ii. Internal Selections (PWTD) | Answer No |
| d. Grade GS-13 | |
| i. Qualified Internal Applicants (PWTD) | Answer No |
| ii. Internal Selections (PWTD) | Answer Yes |

<p>According to Table B11: Internal Selections for Senior Level Positions, PWTD qualified but were not selected at Grades GS-13. Only one PWTD qualified at the SES grade level and was not selected.</p>

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- | | |
|-----------------------------|------------|
| a. New Hires to SES (PWD) | Answer N/A |
| b. New Hires to GS-15 (PWD) | Answer N/A |
| c. New Hires to GS-14 (PWD) | Answer N/A |
| d. New Hires to GS-13 (PWD) | Answer N/A |

<p>While data was unavailable for the FY19 reporting period, plans are being made to capture the data for the FY 2020 MD-715 Report.</p>
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4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- | | |
|------------------------------|------------|
| a. New Hires to SES (PWTD) | Answer N/A |
| b. New Hires to GS-15 (PWTD) | Answer N/A |
| c. New Hires to GS-14 (PWTD) | Answer N/A |
| d. New Hires to GS-13 (PWTD) | Answer N/A |

<p>While data was unavailable for the FY19 reporting period, plans are being made to capture the data for the FY 2020 MD-715 Report.</p>
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5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

- i. Qualified Internal Applicants (PWD) Answer No
- ii. Internal Selections (PWD) Answer No

b. Managers

- i. Qualified Internal Applicants (PWD) Answer No
- ii. Internal Selections (PWD) Answer No

c. Supervisors

- i. Qualified Internal Applicants (PWD) Answer Yes
- ii. Internal Selections (PWD) Answer Yes

According to Table B11: Internal Selections for Senior Level Positions, at the GS-13 Supervisory level, PWD qualified and were selected at a lower percentage rate than those with no disability: PWD: 72.79% of applicants qualified, 6.67% of qualified applicants were selected; No Disability: 87.55% of applicants qualified, 12.34% of qualified applicants were selected.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

- i. Qualified Internal Applicants (PWTD) Answer No
- ii. Internal Selections (PWTD) Answer No

b. Managers

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer No

c. Supervisors

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer Yes

According to Table B11: Internal Selections for Senior Level Positions, at the GS-13 Supervisory Level, PWTD qualified and were selected at a lower percentage rate than those with no disability: PWTD: 65.38% of applicants qualified, 2.94% of qualified applicants were selected; No Disability: 87.55% of applicants qualified, 12.34% of qualified applicants were selected. At the GS-14 Managerial Level, PWTD qualified at a lower percentage rate, but were selected at a higher percentage rate than those with no disability: PWTD: 66.67% of applicants qualified, 50.00% of qualified applicants were selected. No Disability: 87.55% of applicants qualified, 10.66% of qualified applicants were selected.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWD) Answer N/A
- b. New Hires for Managers (PWD) Answer N/A
- c. New Hires for Supervisors (PWD) Answer N/A

While data was unavailable for the FY19 reporting period, plans are being made to capture the data for the FY 2020 MD-715 Report.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWTD) Answer N/A
- b. New Hires for Managers (PWTD) Answer N/A
- c. New Hires for Supervisors (PWTD) Answer N/A

While data was unavailable for the FY19 reporting period, plans are being made to capture the data for the FY 2020 MD-715 Report.

Section VI: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer N/A

There were no Schedule A employees eligible for conversion.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

- a. Voluntary Separations (PWD) Answer Yes
- b. Involuntary Separations (PWD) Answer Yes

According to Table B14 Separation by Type of Separation, there were 2,549 Voluntary Separations: 229 PWD (8.98% of total voluntary separations and 8.51% of total PWD workforce), as compared to 2,234 persons with no disabilities (87.64% of total voluntary separations and 6.96% of total workforce with no disabilities). There were 120 Involuntary Separations: 16 PWD (13.33% of total involuntary separations and .59% of total PWD workforce), as compared to 101 persons with no disabilities (84.17% of total involuntary separations and .31% of total workforce with no disabilities).

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWTD)	Answer	Yes
b. Involuntary Separations (PWTD)	Answer	No

According to Table B14 Separation by Type of Separation, there were 2,549 Voluntary Separations: 52 PWTD (2.04% of total voluntary separations and 8.58% of total PWD workforce), as compared to 2,234 persons with no disabilities (87.64% of total voluntary separations and 6.96% of total workforce with no disabilities). There were 120 Involuntary Separations: 1 PWTD (.83% of total involuntary separations and .16% of total PWD workforce), as compared to 101 persons with no disabilities (84.17% of total involuntary separations and .31% of total workforce with no disabilities).

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

In reviewing separations by Nature of Action Codes (NOA), numerically, the top three reasons for PWD separating were: Resignation, Retirement Voluntary and Termination Appt In. In comparing the number of resignations to the representation of PWD and persons with no disabilities within the total workforce, PWD (76 resignations or 2.82% of total PWD workforce) resigned at 1.05 percentage points higher than persons with no disabilities and Not Identified (588 resignations or 1.77% of workforce). The top three reasons for PWTD leaving the Bureau were: Retirement Voluntary, Resignation and Termination Appt In. In FY 2019, 17 PWTD resigned, which equates to 2.81% of representation within the total PWTD workforce.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

The Bureau's public website and intranet contains information for applicants and employees of their rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint; the link is provided below:
https://www.bop.gov/resources/employee_support.jsp#eeo

2. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under the Architectural Barriers Act, including a description of how to file a complaint.

The Bureau's public website and intranet contains information for applicants and employees of their rights under the Architectural Barriers Act, including a description of how to file a complaint; the link is provided below:
https://www.bop.gov/resources/employee_support.jsp#eeo

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

The Agency’s National Reasonable Accommodation Coordinator (NRAC) has developed a Reasonable Accommodation (RA) Resource webpage, which contains information about accessibility of agency technology, Section 508 contact information and accessibility standards issued under the Architectural Barriers Act of 1968 (ABA). In addition, the webpage includes the Agency’s

Reasonable Accommodation Policy, and links to the Job Accommodation Network (JAN) and the Computer Electronic Accommodation Program (CAP). The CAP link contains specific instructions on making a request for assistive technology and/or equipment and includes notification to the NRAC for tracking and reporting requirements.

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The Bureau documented 244 RA requests in FY19 vs. 210 in FY18; 58 were reassignments. When reassignment is determined to be appropriate, employees receive a RA Letter explaining the process, and as a standard practice, the Bureau works with employees for 60 days in an effort to assist them in finding another position. For purposes of calculating the average processing timeframes, the reassignment cases are evaluated separately. The average timeframe for processing a reassignment case in FY 2019 was 66 days vs. 69 days in FY 2018. There were 12 fewer reassignment requests in FY 2019 vs. FY 2018. For the non-reassignment cases, the average timeframe for processing initial requests was 12 days in FY 2019 vs. 20 days in FY2018.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

The Agency's National Reasonable Accommodation Coordinator (NRAC) continues to assist the Agency with facilitating the processing of requests for reasonable accommodation. It is noted the proposed changes to the reasonable accommodation processing timeframes are anticipated to streamline reassignment efforts and improve program effectiveness. During FY19, the NRAC continued pursuing a rigorous reasonable accommodation training agenda. The training delivered included in-person sessions to mid-level and senior level management officials and Human Resource Offices. Results from these training sessions have led to increased program awareness and understanding of responsibilities in processing requests for reasonable accommodation. During FY19, the number of requests continued to increase. It is noted Temporary Job Modifications (TJMs) account for the majority of "interim" accommodations at the Bureau, and of the 244 requests made during the reporting period, more than 128 were requests for TJMs. The Agency's Human Resource Management Division (HRMD) has identified a second position within the Directorate to assist the NRAC with managing the increase in requests for reasonable accommodation.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The Bureau of Prisons has established a process for employees to make a request for Personal Assistance Services (PAS), for those who request them due to a targeted disability through the Reasonable Accommodation Program. An employee may request PAS by informing their supervisor, or the Human Resource Office, that he/she needs assistance with daily living activities because of a medical condition. The Agency's National Reasonable Accommodation Coordinator (NRAC), may be consulted to assist with PAS related information – and the NRAC must be consulted prior to any denial of such a request. Regarding the effectiveness of implementing the PAS requirement. The NRAC maintains a case tracking system for accommodation requests, and should any requests be made during the next year, those requests will be monitored for trends and to ensure they are processed expeditiously.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer No

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer Yes

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

There was one finding of discrimination alleging harassment based on disability status during FY 2019, which is well below the government-wide average. The finding resulted in compensatory damages, attorney's fees and costs, mandatory disability training for the Responsible Management Officials, and posting of a notice of discrimination finding in the facility. As described above, the Bureau continues to provide relevant training.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer No

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer Yes

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

There were three findings of discrimination involving the failure to provide a reasonable accommodation during FY 2019, which is well below the government-wide average. The findings resulted in one payment of compensatory damages, attorney's fees and costs, three leave restorations, three orders of disability training for managers, and three postings of notices of discrimination findings. Reasonable Accommodation Training is provided to new employees during orientation training and to extant employees annually thereafter. In addition, managers and supervisors complete mandatory training requirements including Schedule A: Roadmap to Success within 60 days of entry to position; Uniformed Services Employment and Reemployment Act (USERRA) and Veteran Employment for Hiring Managers within 60 days of entry to position and annually thereafter; Principles of Leadership Training also incorporates Reasonable Accommodation Training.

Section VIII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer No

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer No

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments
4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

- As a law enforcement agency whose mission-critical positions, such as the positions located directly in our institutions, have some physical requirements, recruitment of new applicants has defined parameters. These physical requirements include the ability to climb stairs, run to emergency situations, and walk and stand for prolonged periods of time.
- The agency's robust security investigation process includes drug testing and a credit report check along with other clearance requirements not normally indicative of non-law enforcement agencies.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

- The Bureau's Diversity Council met regularly to provide advice and recommendations to the Director and senior leadership on diversity and inclusion issues affecting workforce strategies, measurement and evaluation, communication and outreach, and training and education.
- Managers and supervisors were evaluated on their commitment to agency EEO policies and principles. Performance plans incorporated language for commitment to EEO principles and practices in the workplace, including quantifiable benchmarks for recruitment and retention of PWD and PWTD.
- Initiated by DOJ, the Bureau participated in a resurvey of the workforce in August 2019, to encourage employees to review the Standard Form 256, Self-Identification of Disability, and voluntarily self-identify or update their disability status.
- The Affirmative Employment Programs Office (AEPO) communicated at least quarterly, with Regional Affirmative Employment Administrators (RAEAs) located throughout the agency, to share information about the Bureau's strategic approaches to support the employment needs of our nation's veterans, PWD and PWTD.
- The AEPO created more intelligent, innovating reporting tools for use by Regional Offices, Training Centers and Bureau facilities, which allows for streamlined reporting, visually appealing data analysis, better comprehension of findings and ultimately better development of targeted strategies to increase employment of individuals from under-represented groups including PWD and PWTD.
- The Bureau employed a full-time National Recruitment Coordinator and National Reasonable Accommodation Coordinator who both facilitated ongoing efforts towards recruiting, promoting and retaining persons with disabilities.
- In partnership with Accenture, the Bureau initiated a national branding and marketing project to attract qualified applicants, including PWD and PWTD.
- Human Resource Management employees, Disability Employment Program Managers (DEPMs), Recruitment and Outreach Program Coordinators (ROPCs), and other Bureau staff interacted with applicants via telephone, internet, job fairs, community events, and other face-to-face activities. Applicants were informed of the online application process via the Bureau's public website for a variety of disciplines.
- DEPMs and Diversity Instructors provided presentations at staff recalls throughout the year to promote and highlight the diversity and talent of our nation's disabled veterans, and PWD.
- ROPCs and Special Emphasis Program Managers (SEPMs) actively communicated with veteran services organizations throughout the country, state and district employment services, One Stop Career Centers, and representatives from national employment services for referrals of disabled veterans.
- Managers and supervisors joined in supporting the employment of veterans and participated fully in our continued efforts to improve the recruitment and advancement of disabled veterans wherever it was possible to do so.
- Informational packets were sent to military bases throughout the country, focusing on disability employment and disabled veterans organizations.
- Human Resource staff monitored compliance under Section 508 of the Rehabilitation Act of 1973 to ensure employees with disabilities, including disabled veterans, had equal access to training and information.
- Human Resource Services Center staff provided training to SEPMs on veteran employment and special hiring authorities.
- Supervisors and management level employees were required to take the online Uniform Services Employment and Reemployment Rights Act training annually.
- The AEPO provided updates on the status of targeted initiatives for disabled veterans and people with disabilities on the agency intranet and via the electronic mail system.
- DEPMs provided presentations at Staff Recalls throughout the year to encourage, develop, and promote internal advancement opportunities for disabled veterans, and PWD.

- DEPMs and Human Resource staff provided briefings for managers and supervisors on the responsibility of employing and retaining disabled veterans.
- The AEPO monitored personnel policies and practices to limit barriers in employment opportunities for disabled veterans.
- Staff were notified of opportunities to participate in and/or attend programs hosted by the Office of Personnel Management (OPM) and Department of Justice (DOJ) covering areas such as Team Building and Leadership, Diversity and Inclusion, and Executive Management Development Seminars and Programs.
- The Bureau offered details for training in various occupations in an effort to provide staff opportunities to gain experience through temporary work assignments in other disciplines that would otherwise not be afforded to them through their current work assignments.
- The Staff Mentoring Program provided employees with opportunities to augment their personal growth by enhancing their knowledge, skills, abilities, and professional development.
- The Bureau implemented a new automated learning management system which provides all learners with access to online content, enhanced completion of mandatory and professional development initiatives.
- All employees, including disabled veterans, were notified of vacancies and provided with information about procedures to follow in order to be considered for positions.
- Site visits were conducted by Program Review Examiners to evaluate the effectiveness of programs and plans at Bureau facilities. Feedback was provided to the Chief Executive Officers, along with recommendations on corrective measures and/or program enhancements.
- Quarterly, the AEPO and RAEAs monitored statistical information on new hires, promotions, and separations of disabled veterans through information retrieved from the National Finance Reporting Center.
- The AEPO monitored reports submitted by the RAEAs. A national report was compiled on program accomplishments and concerns related to the employment of disabled veterans.
- RAEAs provided training to institution Affirmative Employment Committee members during staff assistance visits. Emphasis continued to be placed on effective recruitment strategies, policy updates, and the effective development of affirmative employment initiatives.
- During FY 2019, Bureau staff participated in recruitment and outreach fairs, many of which were located on or near military bases, and targeted disabled veterans' organizations. After Action Reports detailing these recruitment activities were completed and forwarded to the Central Office for monitoring, review and evaluation.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

- The Bureau's Diversity Council will continue to meet on a regular basis to provide advice and recommendations to the Director and senior leadership on diversity and inclusion issues affecting workforce strategies, measurement and evaluation, communication and outreach, and training and education.
- Managers and supervisors will continue to be evaluated on their commitment to agency EEO policies and principles. Performance plans incorporate language for commitment to EEO principles and practices in the workplace, including quantifiable benchmarks to measure the success for recruitment and retention of PWD and PWTD in the workplace.
- The Bureau will continue to encourage employees to review the Standard Form 256, Self-Identification of Disability, and voluntarily self-identify or update their disability status in order to be more reflective of employment of PWD and PWTD within the workplace.
- The Bureau will provide national training for Special Emphasis Program Managers to ensure affirmative steps are taken at all levels of the organization to provide equal opportunity to minorities, women, and PWD and PWTD in all areas of employment.
- The Bureau will evaluate communication strategies (correspondence, training, national meetings, strategic planning) to further emphasize program goals throughout the organization.
- The Bureau will investigate other agencies' initiatives and best practices to improve the recruitment and advancement of PWD and PWTD.